

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

THE VIDEOTAPED DEPOSITION OF
ROGER OLSEN, PhD, produced as a witness on behalf
of the Defendants in the above styled and numbered
cause, taken on the 2nd day of February, 2008, in
the City of Tulsa, County of Tulsa, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

TULSA FREELANCE REPORTERS
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EXHIBIT

4-2

1 The time is 6:05 p.m.

2 Q Did you sample any fields that had not had
3 litter applied to them which were cited, in other
4 words, located between, say, a poultry farm where
5 litter had been applied and a water body where -- in 06:06PM
6 other words, you've collected -- you identified a
7 poultry signature at a poultry farm and you've
8 identified a poultry signature in water. Did you do
9 anything to take any samples from any pastures in
10 between to determine whether that signature or you 06:06PM
11 saw that signature on those particular parcels?

12 A That wasn't one of our objectives. There may
13 be some examples like that because of all the
14 samples we take, but that wasn't -- we didn't
15 determine where to sample based on that at all. 06:06PM

16 Q Okay. So to your knowledge, as you sit here
17 right now, there isn't a situation where you at
18 least not intentionally gone out and sampled
19 pastures in between a poultry farm and a water body
20 that didn't have litter applied to it? 06:06PM

21 A Well, I know there are some. You know that
22 example, that high flow station forest up and down,
23 you see the farm, you see the field and you see the
24 river. So that was a case where we did sample the
25 river. 06:07PM

1 Q Okay. So you've identified one instance where
2 that was potentially done. Did you do anything in
3 that one instance to compare the levels of any of
4 the parameters of your poultry signature at the farm
5 versus at the intervening pasture versus in the
6 water body?

06:07PM

7 A The way the principal component works right
8 now is we don't combine solid sample, litter samples
9 and soil samples with liquid samples. It's a
10 completely different matrix.

06:07PM

11 Q Okay.

12 A So on all the solid samples, we do litter,
13 soil, sediment.

14 Q So the answer is no to my question?

15 A We don't combine those two types of analysis
16 in what we do.

06:07PM

17 Q So the answer to my question is you didn't do
18 that?

19 MR. PAGE: Object to the form.

20 A I always compare the overall chemical
21 signature, but I didn't put both of them in a PCA
22 and create the scores together, if that's what you
23 are asking.

06:07PM

24 Q Does your poultry signature change in
25 characteristics in litter versus in soil versus in

06:08PM